

RemarksRejections Under 35 U.S.C. § 102(e)

The Examiner has rejected claims 1-13 and 15-28 as anticipated under 35 U.S.C. § 102(e) by United States patent number 6,530,632 issued to Writt (hereinafter referred to as Writt). The Applicant respectfully requests the Examiner's careful consideration of the following explanation in support of overcoming the Examiner's rejections.

Rejections of claims 1-13 Under 35 U.S.C. § 102(e)

The amended claim 1 includes the limitations of "a freely rotating switch to detect manual insertion of the media". Support for this amendment to claim 1 can be found, for example, on page 5, lines 26-32 of the detailed description as well as original claim 3. The Applicant respectfully submits that this limitation is not disclosed in Writt. For example, column 4, lines 58-61 of Writt discloses:

The envelope corner printing apparatus includes an optical emitter 40 and an **optical sensor 41 positioned near the slot to detect the insertion of an envelope corner 50 into the slot 20**. The optical emitter 40 emits a light signal to the optical sensor 41 located on the opposite side of the slot 20. (emphasis added)

Clearly, the limitation of the amended claim 1 of "a freely rotating switch" does not read upon "optical sensor 41".

Additionally, column 5, lines 35-47 of Writt discloses:

An alternative embodiment of the envelope sensing portion of the envelope corner printing apparatus of the present invention is shown in FIG. 5. In FIG. 5, the combination of the optical emitter 40 and the optical sensor 41 is replaced by the use of **a spring clip 42 as an electrical contact switch to detect the presence of the envelope corner 50. The spring clip 42 is in electrical contact with a conductive sensor 45 until the insertion of envelope corner 50 separates the end of the spring clip 42 from the conductive sensor 45 to indicate the presence of the envelope corner 50**. The separation at the end of the spring clip 42 from the conductive sensor 45 sends a signal to the printer main electronics 39 and this initiates printing in accordance with the invention.

(emphasis added)

The Applicants respectfully contend that the limitations of “freely rotating switch” do not read upon “spring clip 42”. Inherently, spring clip 42 exerts force upon conductive sensor 45. Therefore, spring clip 42 does not freely rotate and cannot be read upon by the limitations of “freely rotating switch”.

As the Examiner is certainly aware, MPEP 2131 requires that “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference”. Because the Writt does not disclose subject matter upon which every limitation of the amended claim 1 reads, Writt does not anticipate the amended claim 1 for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C. § 102(e).

Claims 2-13 depend, either directly or indirectly, upon the amended claim 1. Therefore, for at least the reason that the amended claim 1 is not anticipated by Writt, claims 2-13 are not anticipated by Writt. Accordingly, the Applicant respectfully requests withdrawal of the rejections of claims 2-13 under 35 U.S.C. § 102(e).

Rejections of claims 15-19 Under 35 U.S.C. § 102(e)

The amended claim 15 includes the limitations of “a freely rotating switch to detect positioning of the media adjacent to the image-forming mechanism”. As explained previously with respect to the amended claim 1, Writt does not disclose subject matter upon which the limitations of “a freely rotating switch to detect positioning of the media adjacent to the image-forming mechanism” will read. Therefore, Writt does not anticipate the amended claim 15 for at least this reason.

Claims 16-19 are dependent upon the amended claim 15. Therefore, for at least the reason that the amended claim 15 is not anticipated by Writt, claims 16-19 are not anticipated by Writt. Accordingly, the Applicant respectfully requests withdrawal of the rejections of claims 16-19 under 35 U.S.C. § 102(e).

Rejections of claims 20-22 Under 35 U.S.C. § 102(e)

The amended claim 20 includes the limitations of "wherein the means for causing the image-forming mechanism to form an image includes a freely rotating switch actuated by manual insertion of the media". Support for this amendment can be found in the original claim 3. As discussed above with respect claim 1, Writt does not disclose a "freely rotating switch". Rather Writt discloses an "optical sensor" and a "spring clip" as discussed previously with respect to the amended claim 1. Therefore, because Writt does not disclose all of the limitations of the amended claim 20, Writt does not anticipate the amended claim 20 for at least this reason. Accordingly, the Applicants respectfully request withdrawal of the rejection of claim 20 under 35 U.S.C. § 102(e).

Claims 21-22 are dependent upon the amended claim 20. Therefore, for at least the reason that the amended claim 20 is not anticipated by Writt, claims 21-22 are not anticipated by Writt. Accordingly, the Applicants respectfully request withdrawal of the rejections of claims 21-22 under 35 U.S.C. § 102(e).

Rejections of claims 23-28 Under 35 U.S.C. § 102(e)

The amended claim 23 includes the limitations of "detecting manual insertion of media into an opening of an image-forming device using a freely rotating switch". As explained previously with respect to the amended claim 1, Writt does not disclose subject matter upon which the limitations of "detecting manual insertion of media into an opening of an image-forming device using a freely rotating switch" will read. Therefore, Writt does not anticipate the amended claim 23 for at least this reason. Accordingly, the Applicants respectfully request withdrawal of the rejection of claim 23 under 35 U.S.C. § 102(e).

Claims 24-28 are dependent, either directly or indirectly, upon the amended claim 23. Therefore, for at least the reason that the amended claim 23 is not anticipated by Writt, claims 24-28 are not anticipated by Writt. Accordingly, the Applicants respectfully request withdrawal of the rejections of claims 24-28 under 35 U.S.C. § 102(e).

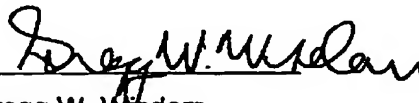
Rejection of claim 14 Under 35 U.S.C. § 103(a)

The Examiner has rejected claim 14 as obvious under 35 U.S.C. § 103(a) over Writt in view of United States patent number 5,013,895 issued to Iggulden et al (hereinafter referred to as Iggulden). Claim 14 is dependent upon the amended claim 1 and therefore incorporates all the limitations of the amended claim 1. As the Examiner is certainly aware, according MPEP 2143, a valid prima facie obviousness rejection requires that "the prior art reference (or references when combined) must teach or suggest all the claim limitations". The Applicants respectfully contend that Iggulden does not disclose "a freely rotating switch to detect manual insertion of the media". Because neither Writt nor Iggulden disclose all the limitations of claim 14, a valid prima facie obviousness rejection of claim 14 is not present for at least this reason. Accordingly, the Applicants respectfully request withdrawal of the rejection of claim 14 under 35 U.S.C. § 103(a).

Conclusion

The Applicants respectfully contend that the subject application is in a condition for allowance. Allowance is respectfully requested.

Respectfully submitted,
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